

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: MING & KIKI LIE : Bankruptcy No. 18-11814MDC  
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DEBTORS : CHAPTER 13

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

The Debtor has filed a Motion to Avoid Lien of Judgment Creditor, AMERICAN EXPRESS CENTURION BANK

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the motion, then on or before **March 31, 2024 you or your attorney must file a response to the Motion.** (see Instructions on next page)

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman on **April 9, 2024 at 10:30 a.m.** in Courtroom #2, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19106.

4. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at:

Robert N.C. Nix, Sr. Federal Courthouse  
Clerk's office  
900 Market Street  
4th Floor  
Philadelphia, PA 19107

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Zachary Perlick, Esquire  
1420 Walnut Street, Suite 718  
Philadelphia, PA 19102  
(215) 569-2922 phone  
(215) 569-1444 fax  
Perlick@verizon.net

Date: 3/11/24